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ECONOMIC AND ENVIRONMENTAL QUESTIONS: SUSTAINABLE DEVELOPMENT

Statement submitted by the Hazardous Materials Advisory Council, a non-governmental organization in consultative status (Roster) with the Economic and Social Council

The Secretary-General has received the following statement, which is circulated in accordance with paragraph 24 of Economic and Social Council resolution 1296 (XLIV) of 23 May 1968.

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Statement of the Hazardous Materials Advisory Council with respect to document E/1996/15

The Hazardous Materials Advisory Council (HMAC) is an international, educational organization devoted to promoting safety in the domestic and international transportation and handling of hazardous materials, substances and wastes. We represent shippers, carriers of all modes of transportation, and a variety of other companies and trade associations involved in the field of dangerous goods transportation. HMAC has consultative status with the International Maritime Organization (IMO), the International Civil Aviation Organization (ICAO) and the Economic and Social Council.

Document E/1996/15, which contains a letter from the Secretary-General of IMO to the Secretary-General of the United Nations, seeks support for increasing the time between successive amendments of the United Nations Recommendations on the Transport of Dangerous Goods from two to four years. It cites the workload associated with amendments to instruments regulating the transport of dangerous

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goods as a major reason why a change to four years would be justified. While we recognize the administrative burden in preparing amendments to international instruments, we strongly believe that four years is too long a time period for updating international dangerous goods regulations.

The United Nations Recommendations are amended principally to incorporate technological advances in packagings and other aspects of dangerous goods transport as well as to modify current transport requirements for individual substances on the basis of new data, ensuring that the shipping requirements are neither too restrictive nor too lax. The amendment process thus facilitates the safe and cost-effective movement of dangerous goods. It is in the best interest of both the hazardous materials industry and the public to ensure that the regulatory regimes that control the movement of dangerous goods are up to date. In our view, this would not be the case if the amendment cycle for the United Nations Recommendations were changed to four years. There is already a lag of two to three years from the time the United Nations Recommendations are amended until they are incorporated and implemented in the various transport modes. Increasing the United Nations amendment cycle to every four years will only further delay this process.

HMAC supports IMO's ongoing efforts to reformat the International Maritime Dangerous Goods (IMDG) Code. Presently the Code is contained in four lengthy volumes and a supplement which, understandably, is very difficult to amend. We believe that discussions within IMO will soon lead to a publication that is much smaller in size and more amenable to detail changes resulting from the amendment process. We would expect that much of the administrative problem within IMO and member States referred to in document E/1996/15 would be alleviated when the Code is reformatted.

HMAC strongly recommends retention of the current amendment cycle for the United Nations Recommendations at two-year intervals. As a minimum, we further recommend that discussion on this issue in the Economic and Social Council be deferred until after the United Nations Committee of Experts on the Transport of Dangerous Goods meets in December 1996 so that the entire matter can be thoroughly examined and the Committee has the opportunity to suggest appropriate action.